

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION,
Plaintiff,

v.

STANFORD INTERNATIONAL BANK, LTD., *et al.*,
Defendants.

Case No. 3:09-CV-0298-N

**NOTICE OF AMENDED SETTLEMENT AND BAR ORDER
PROCEEDINGS**

PLEASE TAKE NOTICE that, on the one hand, the Court-appointed Receiver for the Stanford Receivership Estate (“Receiver”) and the Official Stanford Investors Committee (“Committee”), and, on the other hand, Certain Underwriters at Lloyd’s of London,¹ Arch Specialty Insurance Company, and Lexington Insurance Company (collectively, “Underwriters”), have amended the Settlement Agreement entered into on June 6, 2016 (the “Original Agreement” and, as amended, the “Amended Agreement”).

Notice of the Original Agreement was previously published in 2016.

PLEASE TAKE FURTHER NOTICE that the Amended Agreement modifies and clarifies the Original Agreement by:

- (1) permitting former Stanford directors, officers, and employees an opportunity to present a claim to the proceeds of the settlement through the Receiver’s claims process;
- (2) permitting former Stanford directors, officers, and employees to continue to assert certain types of claims against Underwriters notwithstanding the settlement; and
- (3) clarifying that the settlement does not prevent Stanford Investors from suing their former Stanford brokers.

PLEASE TAKE FURTHER NOTICE that the Receiver has requested that the Court approve the Amended Agreement, enter the accompanying bar orders and judgments, and confirm the Court’s prior award of attorneys’ fees (the “Motion”).

Copies of the Amended Agreement, the Motion, and other supporting papers may be obtained from the Court’s docket in the SEC Action (ECF No. 3004), and are also available on the websites of the Receiver (<http://www.stanfordfinancialreceivership.com>) and the Examiner (www.lpf-law.com/examiner-stanford-financial-group/).

¹ Certain Underwriters at Lloyd’s, London include Syndicates 2987, 2488, 1084, 1886, 4000, 1183, and 1274.

Any objection to the Amended Agreement or the Motion must be filed, in writing, with the Court in the SEC Action no later than Tuesday, July 28, 2020. You may file an objection with the Court by mailing the objection to the Court at the following address:

District Judge David C. Godbey
1100 Commerce Street, Room 1504
Dallas, Texas 75242-1003

You should also send copies of your objection to counsel for the Receiver and for Underwriters by mail or email to the following addresses:

COUNSEL FOR UNDERWRITERS

Manuel Mungia, Jr.
Matthew E. Pepping
Chasnoff Mungia Valkenaar Pepping & Stribling, LLP
1020 N.E. Loop 410, Suite 150
San Antonio, Texas 78209
mmungia@chasnoffstribling.com
mpepping@chasnoffstribling.com

COUNSEL FOR RECEIVER

Michael J. Kuckelman
Stephen J. Torline
Kuckelman Torline Kirkland, LLC
10740 Nall, STE 250
Overland Park, KS 66211
mkuckelman@ktk-law.com
storline@ktk-law.com

Kevin M. Sadler
Baker Botts LLP
1001 Page Mill Road
Building One, Suite 200
Palo Alto, California 94304-1007
Kevin.sadler@bakerbotts.com

Any objections not filed with the Court by Tuesday, July 28, 2020 will be deemed waived and will not be considered by the Court.

If the Court sets a hearing on the Motion, it will post notice of the hearing on the docket of the above-captioned case. Notice will be further published on the websites of the Receiver (<http://www.stanfordfinancialreceivership.com>) and Court-appointed Examiner (www.lpf-law.com/examiner-stanford-financial-group/).